

1 J Christopher Jorgensen, Esq.
 Nevada Bar No. 5382
 2 Chad Olsen, Esq.
 Nevada Bar No. 12060
 3 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**
 3993 Howard Hughes Parkway, Suite 600
 4 Las Vegas, NV 89169
 Tel: (702) 949-8200
 5 Fax: (702) 949-8398
 CJorgensen@lewisroca.com
 COlsen@lewisroca.com

7 *Attorneys for Defendant Kia America, Inc.*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Nathan Bain,
 11 Plaintiff,
 12 vs.
 13 Backgroundchecks.com LLC; Equifax
 Information Services LLC; and Kia America,
 14 Inc. dba Kia Motor Finance,
 15 Defendant.

Case No. 2:22-cv-00851-RFB-VCF

**DEFENDANT KIA AMERICA, INC.'S
 UNOPPOSED MOTION TO EXTEND
 DEADLINE TO RESPOND TO
 COMPLAINT
 (FIRST REQUEST)**

17 Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Kia America, Inc.
 18 (“Kia”), through its attorneys, respectfully requests that the Court extend the deadline in which Kia
 19 has to answer or otherwise plead to Plaintiff’s Complaint, by 21 days, through and until July 13,
 20 2022. In support of its Motion, Kia states as follows:

- 21 1. Plaintiff filed the Complaint initiating this action on May 27, 2022. [Dkt. 1].
- 22 2. Plaintiff served the Summons and Complaint on Kia effective June 1, 2022. [Dkt.
 23 6]. This established an initial deadline for Kia to respond to the Complaint by June 22, 2022. *Id.*
- 24 3. Kia's deadline to respond to the Complaint has not yet expired.
- 25 4. Kia now respectfully requests that the Court extend Kia's deadline to respond to the
 26 Complaint by 21 days, through and including July 13, 2022.
- 27 5. Counsel for Kia discussed the requested extension with counsel for Plaintiff, who
 28 does not oppose the requested extension.

1 6. Kia desires additional time to respond to the Complaint in order to investigate the
2 allegations and determine whether early resolution is possible.

3 7. This is Kia's first request for an extension; this request is brought in good faith and
4 not made to unnecessarily delay discovery or the proceedings in this matter.

5 8. No party will be prejudiced by the requested extension nor, respectfully, will the
6 extension unduly burden the Court.

7 9. Granting the requested extension is in the interest of justice and is otherwise right
8 and proper.

9 **WHEREFORE** Defendant Kia America, Inc. respectfully requests that the Court grant its
10 Unopposed Motion for Extension of Time to Respond to Complaint, extending its deadline to
11 answer or otherwise plead to Plaintiff's Complaint by and through July 13, 2022, and award such
12 other relief the Court deems just and proper.

13
14 DATED this 22nd day of June, 2022.

15 **LEWIS ROCA ROTHGERBER CHRISTIE LLP**

16 _____
17 /s/ *J Christopher Jorgensen* _____
18 J Christopher Jorgensen, Esq.
19 Nevada Bar No. 5382
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23 Las Vegas, NV 89169
24 Tel: (702) 949-8200
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27 COlsen@lewisroca.com

28 *Christopher Jorgensen*
29 Attorneys for Defendant Kia America, Inc.

30 **IT IS SO ORDERED**

31 _____
32 *Christopher Jorgensen*
33 UNITED STATES MAGISTRATE JUDGE

34 **DATED: June 24, 2022**

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that, on June 22, 2022, a true and exact copy of the foregoing has been
3 served upon all parties via CM/ECF.

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5 _____
6 /s/ Annette Jaramillo
7 An employee of Lewis Roca
8 Rothgerber Christie LLP

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3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169

LEWIS ROCA